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6 *And High Desert Irrigation*

7  
8 **IN THE UNITED STATES BANKRUPTCY COURT**  
9 **FOR THE DISTRICT OF ARIZONA**

10 In re:

11 FAR WEST PUMP COMPANY,  
12 Debtor.

In Proceedings Under Chapter 11

Case No. 4:17-bk-11112-BMW Chapter: 11

13 **DUNLAP WITNESS AND**  
14 **EXHIBIT LIST**

15 Pursuant to the Court's Order [Doc. 412], Creditors Tina and Doug Dunlap and High  
16 Desert Irrigation (collectively, the "Dunlaps") submit the following in connection with the  
17 evidentiary hearing presently scheduled for 11 a.m., January 16, 2019.

18 1. The Dunlaps do not intend to call any witness of their own at the above-  
19 referenced hearing, but they reserve the right to cross-examine any witness who may called  
20 to testify, including but not limited to Mr. Leonard, Channa Vaught and Clark Vaught.

21 2. The Dunlaps object to the use of any affidavit, declaration or other such written  
22 statement in lieu of living testimony at this hearing, as the use of written submissions would  
23

1 deprive the Dunlaps and others of the right to cross-examination, and the Court has already  
2 indicated that live testimony will be required for this hearing.

3           3.       The Dunlaps reserve the right to use any or all of the following documents at  
4 the hearing:

- 5           • Leonard's Amended Proof of Claim [No. 26-2]
- 6           • Debtor's Motion to Approve Settlement with Leonard [Doc. 280]
- 7           • Debtor's Notice of Filing Leonard Engagement Agreement and Assignment
- 8           [Doc. 370]
- 9           • Complaint by Farwest against Joel Rodriguez and others in Pima County
- 10          Superior Court Case No. C20150425.
- 11          • Motion to Withdraw as Counsel filed by Leonard in the Rodriguez case.
- 12          • Arizona Corporation Commission summary for Farwest Pump Company
- 13          • ACC search results for Farwest Well
- 14          • ACC summary for Leonard & Felker PLC
- 15          • ACC summary for David J. Leonard PLC
- 16          • Secura Insurance summary of payments.
- 17
- 18

19           Copies of the above-referenced materials, other than those filed with this Court, are  
20 being provided to counsel on this date.

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1 DATED January 2, 2019.

2 **RUSING LOPEZ & LIZARDI, P.L.L.C.**

3 /s/ Rebecca K. O'Brien

4 Rebecca K. O'Brien

5 *Attorneys for Christina and Doug Dunlap and*  
6 *High Desert Irrigation*

7 **CERTIFICATE OF SERVICE**

8 I hereby certify that on the 2nd day of January 2019, I electronically transmitted the  
9 foregoing document to the United States Bankruptcy Court, District of Arizona Clerk's Office  
10 using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the  
11 following CM/ECF registrants:

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35 By: /s/ Sharon Waller